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**TROY LAW, PLLC**  
ATTORNEYS / COUNSELORS AT LAW DATE FILED: 11/19/19  
Tel: (718) 762-1324 troylaw@troypllc.com Fax: (718) 762-1342  
41-25 Kissena Boulevard, Suite 119, Flushing, NY 11355

November 14, 2019

**Via ECF**

Hon. John G. Koeltl, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

A CONFERENCE WILL BE HELD  
ON MONDAY, DECEMBER 2,  
2019, AT 3:00PM,  
SO ORDERED.

JGK/OK/clip ✓ S O J

**Re: Plaintiff's Request to Compel Defendants to Respond to Plaintiff's Local Rule 26.1  
Demand, Interrogatories and Request for Document Production,  
and to Extend Time to Complete Discovery**  
19-cv-02632-JGK Wu v. Lan Sheng Szechuan Foo Inc. et al

11/18/19

Dear Honorable Judge Koeltl:

This office represents the Plaintiff's in the above-captioned matter. We write respectfully to compel Defendants to (i) respond to Plaintiff's Local Rule 26.1 demand to identify the legal name of Defendant Angie "Doe," which we sent the letter demand to Defense Counsel on July 12, 2019; and (ii) produce responses to Plaintiff's First Set of Interrogatories and First Request for Document Production, which we sent the requests to Defense Counsel on August 5, 2019. Due to the discovery deficiency, we further, respectfully, request an extension of time up to February 29, 2020 to allow Defendants to cure their discovery deficiencies and allow time for both parties to conduct depositions.

**Plaintiff's Local Rule 26.1**

Your Honor, on July 12, 2019, we emailed Plaintiff's Local Rule 26.1 Demand to verify the legal name of Defendant Angie "Doe," which Defendants had until July 19, 2019, to provide us the legal name of the person. On August 5, 2019, we followed up on this demand, and Defense Counsel promised to give us the full name of Angie "Doe" after inquiring from Defendants. On August 26, 2019, we refollowed up, and Defense Counsel responded that his client was in Canada. After that, we refollowed up on two other occasions on August 27, 2019, and September 20, 2019.

Therefore, Plaintiff respectfully request that Defendants produce the legal name of Angie "Doe" in response to the Local Rule 26.1 Demand.

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Plaintiff's Discovery Request

Your Honor, on August 5 2019, we emailed Plaintiff's First Set of Interrogatories and First Request for Document Production together with Deposition Notices to all Defendants. Since Defendants failed to timely respond to Plaintiff's discovery requests, which shall be completed by September 4, 2019, we sent out No Objection Letter on September 19, 2019, and as a professional courtesy, allowed Defendants up to September 25, 2019. On September 24, 2019, Defendants requested to respond to the Plaintiff's discovery requests by September 27, 2019. Until today, we have not received any responses from Defendants.

Therefore, Plaintiff respectfully request that Defendants produce responses to Plaintiff's First Set of Interrogatories and First Request of Document Demand.

Deposition

The current deadline for parties to complete discovery is set to November 22, 2019 (Dkt. No. 20). However, no deposition has been taken place yet.

Your Honor, we have made good-faith effort to resolve these matters between parties. However, it seems we could not avoid the Court's intervention. For these reasons, Plaintiff respectfully request that Defendants be compelled to produce the legal name of Angie "Doe" pursuant to Local Rule 26.1 and the responses to Plaintiff's discovery requests. In addition, Plaintiff respectfully requests that the Court allow additional time for parties to conduct discovery until February 29, 2020.

We thank the Court for its time and consideration in this matter and apologize for any inconvenience caused to this Court.

Respectfully submitted,

TROY LAW, PLLC

/s/ John Troy  
John Troy  
*Attorney for Plaintiffs*

/ll

cc: all counsel of record via ECF